

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
AT CHARLESTON**

IN RE: ETHICON, INC., PELVIC REPAIR SYSTEM PRODUCTS LIABILITY LITIGATION	Master File No. 2:12-MD-02327 MDL 2327 JOSEPH R. GOODWIN U.S. DISTRICT JUDGE
THIS DOCUMENT RELATES TO: WAVE 3 CASES LISTED IN EXHIBIT A, ATTACHED	

**MOTION TO EXCLUDE GENERAL-CAUSATION TESTIMONY OF
NEERAJ KOHLI, M.D., M.B.A.**

Defendants Ethicon, Inc., Johnson & Johnson, and, if applicable, Ethicon, LLC (Ethicon) move to exclude certain general-causation testimony of Neeraj Kohli, M.D., M.B.A. Dr. Kohli's proposed opinion testimony is unreliable and irrelevant under the standard set forth in *Daubert v. Merrell Dow Pharm., Inc.*, 509 U.S. 579 (1993), and as expressed by this Court in prior rulings. Ethicon incorporates its Memorandum in Support of Motion to Exclude General-Causation Testimony of Neeraj Kohli, M.D., M.B.A., and also the following exhibits:

1. The list of cases to which this motion applies, identified by case style and number, attached as Exhibit A;
2. Rule 26 Expert Report of Neeraj Kohli, M.D., M.B.A., attached as Exhibit B;
3. The deposition of Neeraj Kohli, M.D. taken March 21, 2016, attached as Exhibit C;

4. Articles cited in Rule 26 Expert Report of Neeraj Kohli, M.D., M.B.A. in footnote 17 on page 26, attached as Exhibit D.

WHEREFORE, FOR THESE REASONS and as more fully set forth in Ethicon's supporting memorandum of law, Ethicon respectfully requests that this Court enter an order granting Ethicon's Motion to Exclude the General-Causation Testimony of Neeraj Kohli, M.D., M.B.A.

Respectfully submitted,

ETHICON, INC., JOHNSON & JOHNSON,
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CERTIFICATE OF SERVICE

I certify that on September 19, 2016, I electronically filed this document with the clerk of the court using the CM/ECF system, which will send notification of this filing to CM/ECF participants registered to receive service in this MDL.

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